REMARKS

Claim 8 has been cancelled without prejudice.

Claims 1, 2, 5, 6, 9-11, 14, 15, and 17-19 have been amended.

Claims 1-7 and 9-20 are pending.

Claims 1, 2, 5, 6, 9-11, 14, 15, and 17-19 have been amended to more clearly point out that which is being claimed.

Claims 1-3, 7, 9-12 and 16-20 stand rejected under 35 U.S.C 103(a) as being unpatentable over U.S. Patent No. 6,269,382 issued to Cabrera et al. (*Cabrera*) in view of U.S. Patent No. 6,704,118 issued to Hull et al. (*Hull*).

Claims 4-6 and 13-15 stand rejected under 35 U.S.C 103(a) as being unpatentable over *Cabrera* in view of *Hull* further in view of U.S. Patent No. 5,440,401 issued to Parulski et al. (*Parulski*).

Applicant traverses these rejections for at least the following reasons and respectfully requests reconsideration and withdrawal of the rejections and prompt allowance of the pending claims.

Prior to discussing the rejections, it may be useful to point out that all of the pending Claims are drawn to <u>digital sender devices</u> and/or apparatuses that include such. As stated in the Specification:

> Digital sender devices allow users to send e-mail to one or more other users by entering the other user(s) e-mail addresses and/or selecting a defined list of recipients. The user then scans one or more documents using the digital sender device. The digital sender then forwards a digital representation of the scanned documents to the listed recipients over an interconnecting network.

Cabrera discloses computer systems and methods for migrating data from local storage to remote storage. *Cabrera* teaches techniques by which a pre-migration of data may occur prior to a planned migration time. Thus, when the time does arrive for the planned migration, the migration has already occurred. This may prove more efficient, however, it is noted that a copy of the pre-migrated data is stored in both the local data storage device and in the remote data storage device until the planned migration time, at which point the local copy can be deleted.

Hull discloses that a workstation can be connected to a network and configured to collect and store documents that are copied by a networked copier, printed by a networked printer, or faxed by a networked facsimile machine.

Parulski discloses database techniques for storing digitized image data. Here two systems are used. The first system includes a 35mm filmstrip digitizing scanner that is connected to a workstation. The database techniques are performed within the workstation and as a result an optical disc is produced. The optical disc is then physically moved to the second system, which includes a playback device connected to a television and thermal printer. The playback device allows for selective display or printing of either low or high resolution digitized image data.

Claim 1 is drawn to a method for use with a digital sender device. The method includes inserting a removable data storage media into a removable data storage mechanism arranged within a digital sender device and operatively coupling the removable data storage media to logic arranged within the digital sender device, and configuring at least one object on a scanning mechanism of the digital sender device and optically scanning the at least one object using the

scanning mechanism to form corresponding scanned object data. The method further includes inputting recipient electronic mail address data through a user interface of the digital sender device, and with the logic, generating outgoing electronic mail message data using the recipient address data, the electronic mail message data including at least a portion of the scanned object data. The method also includes sending the electronic mail message data using a network interface of the digital sender, and storing at least the electronic mail message data on the removable data storage media.

Neither *Cabrera*'s techniques, *Hull*'s techniques, and/or *Parulski*'s techniques are drawn to apparatuses having digital sender devices as in the pending claims.

With regard to independent **Claim 1**, for example, *Cabrera, Hull,* and/or *Parulski* fail to disclose or otherwise suggest inserting a removable data storage media into a removable data storage mechanism arranged within a digital sender device and operatively coupling the removable data storage media to logic arranged within the digital sender device. Indeed, *Cabrera* does not appear to care about removable data storage media since the invention in *Cabrera* is meant for use in backing-up data automatically from a local storage drive to remote storage drives. While *Hull*'s and *Parulski*'s workstations may use removable data storage media, they are clearly not digital senders as recited in Claim 1 as pointed out below.

Cabrera, Hull, and/or *Parulski* also fail to disclose or otherwise suggest configuring at least one object on a scanning mechanism of the digital sender device and optically scanning the at least one object using the scanning mechanism to form corresponding scanned object data. *Cabrera* does disclose

scanning local disk drives to locate and identify data files that can be migrated to remote disk drives, however this type of scanning is obviously different than that being recited and that which is performed by the digital sender device. *Hull*'s workstation monitors separate networked copiers and/or facsimile devices over the network, but does not include a scanning mechanism as recited in Claim 1. *Parulski* uses a separate peripheral filmstrip scanning device that is connected to the workstation.

Cabrera, Hull, and/or *Parulski* also fail to disclose or even reasonably suggest inputting recipient electronic mail address data through a user interface of the digital sender device, and with the logic, generating outgoing electronic mail message data using the recipient address data, the electronic mail message data including at least a portion of the scanned object data. Accordingly, *Cabrera* also fails to teach the acts of sending the electronic mail message data using a network interface of the digital sender, and storing at least the electronic mail message data on the removable data storage media. The automated data file migration techniques taught by *Cabrera* do not use electronic mail or require any input of electronic mail message data. The automated peripheral device monitoring techniques taught by *Hull* do not use electronic mail or require any input of electronic mail message data. *Parulski* does not even mention electronic mail addresses and/or message data as such is not a part of the database techniques being taught.

Consequently, **Claim 1** is clearly patentable over *Cabrera, Hull,* and/or *Parulski*, alone or in combination, as are dependent **Claims 2- 7 and 9-10.**

Similarly, independent **Claim 11** is drawn to an apparatus that includes a digital sender device having a data storage mechanism that is configurable to access a removable data storage media, an optical scanning mechanism

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configurable to optically scan at least one object and produce corresponding scanned object data, a network communication interface configurable to operatively connect to at least one network, a user interface configurable to receive user inputs, and logic operatively coupled to the data storage

5 mechanism, the optical scanning mechanism, the network communication interface, and the user interface. The logic is configured to combine recipient electronic mail address data received through the user interface with at least a portion of the scanned object data to form electronic mail message data that is then output by the network communication interface and stored by the data

10 storage mechanism on the removable data storage device.

For at least the reasons stated above with regard to Claim 1, *Cabrera*, *Hull,* and/or *Parulski* also fail to disclose or otherwise suggest an apparatus having a digital sender as recited in **Claim 11**. Consequently, **Claim 11** is also clearly patentable over *Cabrera* and/or *Hull*, alone or in combination, as are

15 dependent **Claims 12-20**.

Respectfully Submitted,

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